

**UNITED STATES BANKRUPTCY COURT**  
**MIDDLE DISTRICT OF PENNSYLVANIA**

In re: Debtor(s) name(s) used by the debtor(s) in the last 8 years, including married, maiden, and trade):

William Martin Kitchin  
**Debtor 1**

Rushmore Loan Management Services, LLC, as servicer for US Bank, National Association, not in its individual capacity but solely as trustee for RMTP Trust, Series 2021 BKM-TT

**Movant(s)**

v.

William Martin Kitchin

**Respondent(s)**

Jack N. Zaharopoulos, Esquire  
Standing Chapter 13 Trustee

**Additional Respondent**

**Chapter 13**

**Case No.** 1:18-BK-00057-HWV

**Matter:** Motion for Relief from the Automatic Stay

**Document No. 46**

**DEBTOR(S)' ANSWER TO MOVANT(S)' MOTION  
FOR RELIEF FROM THE AUTOMATIC STAY**

AND NOW, come the Debtor(s), William Martin Kitchin, through their attorney, Paul D. Murphy-Ahles, Esquire and DETHLEFS PYKOSH & MURPHY, who files the within Debtor(s)' Answer to Movant(s)' Motion for Relief from the Automatic Stay and aver as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted. Debtor(s) stand ready to bring their account current per stipulation terms agreeable to the parties.
7. Paragraph 7 contains a conclusion of law to which no response is required.
8. Paragraph 8 contains a conclusion of law to which no response is required.
9. Admitted.
10. Admitted. Debtor(s) stand ready to bring their account current per stipulation terms agreeable to the parties.
11. Paragraph 11 is omitted from the original pleading.
12. Admitted.
13. Admitted.

14. Paragraph 14 contains a conclusion of law to which no response is required.
15. Paragraph 15 contains a conclusion of law to which no response is required.

WHEREFORE, Debtor(s) requests this Court deny the requested relief.

Respectfully submitted,  
**DETHLEFS PYKOSH & MURPHY**

Date: August 9, 2022

/s/ Paul D. Murphy-Ahles

Paul D. Murphy-Ahles, Esquire  
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Camp Hill, PA 17011  
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*Attorney for Debtor(s)*

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**CERTIFICATE OF SERVICE**

I hereby certify that on Tuesday, August 9, 2022, I served a true and correct copy of the **Debtor(s)' Answer to Movant(s)' Motion for Relief from the Automatic Stay** in this proceeding via electronic means upon the following:

Lauren Moyer, Esquire  
FRIEDMAN VARTOLO, LLP  
1325 Franklin Avenue, Suite 160  
Garden City, NY 11530  
*Counsel for Movant(s)*

Jack H. Zaharopoulos, Esquire  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036

Office of the United States Trustee  
Ronald Reagan Federal Building  
228 Walnut Street, Room 1190  
Harrisburg, PA 17101

/s/ Kathryn S. Greene

Kathryn S. Greene, RP®, Pa.C.P.  
Paralegal for Paul D. Murphy-Ahles, Esquire